

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*IN RE* TERRORIST ATTACKS ON SEPTEMBER 11, 2001

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) No. 03 MDL 1570 (GBD/FM)  
) ECF Case  
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This document relates to:

WORLD TRADE CENTER PROPERTIES LLC, *et al.* v. AL BARAKA INVESTMENT AND  
DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07280.

**DEFENDANT PEROUZ SEDAGHATY'S  
ANSWER TO COMPLAINT**

Defendant Perouz Sedaghaty ("Sedaghaty"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits his Answer to Plaintiffs' Complaint ("Complaint").

**INTRODUCTION**

1. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

2. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

3. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

4. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

5. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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36. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

37. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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### **Jurisdiction and Venue**

41. Sedaghaty denies that this court has subject matter jurisdiction over him under 28 U.S.C. §§ 1331 and 1367, and 18 U.S.C. §§ 1962 (RICO), 2334, and 2338 (Anti-Terrorism Act). Sedaghaty denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§ 1330(a), and 1603-1611, because those provisions apply solely to actions against foreign states.

42. Sedaghaty denies that jurisdiction over plaintiffs' claims against him is proper under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7), because those provisions apply solely to actions against foreign states.

43. Sedaghaty denies that venue is proper under "28" [*sic*, 18] U.S.C. § 2334. Sedaghaty denies that venue is proper under 28 U.S.C. §§ 1391(d) and 1391(f)(4), because those provisions apply solely to actions against aliens and foreign states.

### **Parties -- Plaintiffs**

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**Factual Allegations Against Defendants**

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96. Sedaghaty denies the allegations in this paragraph insofar as they refer to the Al Haramain Islamic Foundation, Inc. (“AHIF-USA”). Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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279. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

280. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

281. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

282. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

283. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

284. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

285. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

286. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

287. Sedaghaty admits that the United States Treasury Department designated AHIF-USA and froze its assets. Sedaghaty denies the other allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

288. Sedaghaty does not possess sufficient knowledge or information to admit or deny

the allegations contained in this paragraph.

289. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

290. Sedaghaty does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

291. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

292. Sedaghaty denies that AHIF-USA is “controlled primarily from al-Haramain’s headquarters in Riyadh, Saudi Arabia.” Sedaghaty admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. Sedaghaty admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia) as terrorist entities. Sedaghaty denies all other allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

293. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

294. Sedaghaty admits that AHIF-USA is incorporated and registered to do business in Oregon. Sedaghaty denies the remaining allegations in this paragraph insofar as they refer to AHIF-USA, Soliman H.S. al-Buthe, or Perouz Seda Ghaty. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

295. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

296. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

297. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

298. Sedaghaty admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia). Sedaghaty denies the other allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

299. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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309. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other

allegations contained in this paragraph.

310. Sedaghaty denies that AHIF-USA is a business entity of al-Haramain (Saudi Arabia), and avers that “al-Haramain [sic] Foundation” and the “al-Haramain [sic] Islamic Foundation” are assumed business names of AHIF-USA under Oregon law, and denies that they are business entities of al-Haramain (Saudi Arabia). Sedaghaty denies that AHIF-USA, al-Haramain [sic] Foundation, or al-Haramain [sic] Islamic Foundation, are one and the same as al-Haramain’s office in Riyadh, Saudi Arabia. Sedaghaty admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. Sedaghaty denies the remaining allegations in this paragraph, including that he is specifically linked to al Qaeda operations.

311. Sedaghaty denies that AHIF-USA’s Year 2000 Form 990 states that “it operates an Islamic center in Springfield, Missouri;” instead, its Year 2000 Form 990 states that “Prayer houses are located in Ashland, Ore. and Springfield, Mo.,” and the Springfield prayer house is operated by a separate group. Sedaghaty denies that the property in Springfield, Missouri is owned by al-Haramain (Saudi Arabia). Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph, to the extent an additional response is required.

312. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

313. Sedaghaty denies the allegations in this paragraph insofar as they refer to AHIF-USA. Sedaghaty does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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## **CLAIMS**

### **Count One — Anti-Terrorism Act**

1125. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1126. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1127. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1128. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1129. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1130. No response is required to the allegations in this paragraph because the aiding and abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to

which no response is required. To the extent a response is required, the allegations are denied.

1131. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**Count Two — RICO**

1132. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1133. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1134. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**Count Three — RICO**

1135. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1136. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1137. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated

September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1138. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1139. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1140. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1141. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1142. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**Count Four — RICO**

1143. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1144. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1145. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1146. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1147. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1148. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1149. No response is required to the allegations in this paragraph because the RICO

cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1150. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

#### **Count Five — Trespass**

1151. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1152. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1153. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1154. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1155. No response is required to the allegations in this paragraph because the aiding and abetting and conspiracy causes of action were dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1156. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1157. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**Count Six — Property Damage**

1158. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1159. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1160. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1161. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1162. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

**Count Seven — Conspiracy**

1163. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1164. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1165. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to

which no response is required. To the extent a response is required, the allegations are denied.

1166. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1167. No response is required to the allegations in this paragraph because the Conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

#### **Count Eight — Aiding and Abetting**

1168. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1169. No response is required to the allegations in this paragraph because the aiding and abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1170. No response is required to the allegations in this paragraph because the aiding and abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1171. No response is required to the allegations in this paragraph because the aiding and abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to

which no response is required. To the extent a response is required, the allegations are denied.

1172. No response is required to the allegations in this paragraph because the aiding and abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1173. No response is required to the allegations in this paragraph because the aiding and abetting cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

#### **Count Nine — Violations of International Law**

1174. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1175. No response is required to the allegations in this paragraph because the International Law cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1176. No response is required to the allegations in this paragraph because the International Law cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1177. No response is required to the allegations in this paragraph because the

International Law cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1178. No response is required to the allegations in this paragraph because the International Law cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1179. No response is required to the allegations in this paragraph because the International Law cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

### **Punitive Damages**

1180. Sedaghaty hereby incorporates his responses to the previous allegations as if fully set forth herein.

1181. No response is required to the allegations in this paragraph because the Punitive Damages cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1182. No response is required to the allegations in this paragraph because the Punitive

Damages cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

1183. No response is required to the allegations in this paragraph because the Punitive Damages cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

### **Prayer for Relief**

1184. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count One against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1185. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Two against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1186. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Three against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1187. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Four against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1188. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Five against Sedaghaty, or that they are entitled to any relief in this

action against Sedaghaty.

1189. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Six against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1190. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Seven against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1191. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Eight against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

1192. Sedaghaty denies that plaintiffs are entitled to any of the relief requested in their prayer for relief under Count Nine against Sedaghaty, or that they are entitled to any relief in this action against Sedaghaty.

### **Jury Demand**

Plaintiffs' statement regarding a jury trial and jury demand contain no allegations to which a response is required.

Each and every allegation in plaintiffs' complaint that has not been specifically admitted is hereby denied.

### **FIRST AFFIRMATIVE DEFENSE**

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against Sedaghaty for which relief may be granted.

### **SECOND AFFIRMATIVE DEFENSE**

(Causation)

There is no causal connection between any of Sedaghaty's activities and plaintiffs' injuries.

**THIRD AFFIRMATIVE DEFENSE**

(Causation)

No act or omission of any agent, servant, or employee of Sedaghaty proximately caused any harm or damage to plaintiffs.

**FOURTH AFFIRMATIVE DEFENSE**

(Causation)

Sedaghaty's activities were not the proximate cause of any harm or damage to plaintiffs.

**FIFTH AFFIRMATIVE DEFENSE**

(Scienter)

Plaintiffs fail to adequately allege scienter on Sedaghaty's part.

**SIXTH AFFIRMATIVE DEFENSE**

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

**SEVENTH AFFIRMATIVE DEFENSE**

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against Sedaghaty.

**EIGHTH AFFIRMATIVE DEFENSE**

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against Sedaghaty.

**NINTH AFFIRMATIVE DEFENSE**

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against Sedaghaty.

**TENTH AFFIRMATIVE DEFENSE**

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against Sedaghaty.

**ELEVENTH AFFIRMATIVE DEFENSE**

(Statute of Limitations)

Plaintiffs' claims against Sedaghaty are barred, in whole or in part, by the applicable statute of limitation(s).

**TWELFTH AFFIRMATIVE DEFENSE**

(Punitive Damages)

Plaintiffs' claims for punitive damages against Sedaghaty are barred because Sedaghaty's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of Sedaghaty's activities in any way were intended to, or did harm, the plaintiffs in this action.

#### **THIRTEENTH AFFIRMATIVE DEFENSE**

(Joint or Several Liability)

Defendant is not liable for plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, under N.Y. C.P.L.R. § 1601 *et seq.*

#### **FOURTEENTH AFFIRMATIVE DEFENSE**

(No Double Recovery)

Plaintiffs have waived their claims based on the doctrine disallowing double recovery and/or the doctrine of election of remedies.

#### **FIFTEENTH AFFIRMATIVE DEFENSE**

(Collateral Source)

Plaintiffs have waived their claims based on the collateral source doctrine.

#### **SIXTEENTH AFFIRMATIVE DEFENSE**

(Subrogation)

Plaintiffs have waived their claims based on the doctrine of subrogation and/or the doctrine of equitable subrogation.

**SEVENTEENTH AFFIRMATIVE DEFENSE**

In response to plaintiffs' claims, Sedaghaty intends to invoke any other defenses, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

Sedaghaty requests that the Plaintiffs' Complaint be dismissed with prejudice as to him, and that the Court award attorney's fees and costs to Sedaghaty in defending against a case with no factual or legal basis against him, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

/s/ Lynne Bernabei

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Attorneys for Defendant  
Perouz Sedaghaty

Dated: October 15, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2010, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

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Alan R. Kabat